

SIDLEY AUSTIN LLP

Thomas R. Califano (24122825)
Jeri Leigh Miller (24102176)
Parker G. Embry (24126826)
Chelsea McManus (24131499)
2021 McKinney Avenue, Suite 2000
Dallas, Texas 75201
Telephone: (214) 981-3300
Facsimile: (214) 981-3400
Email: tom.califano@sidley.com
jeri.miller@sidley.com
parker.embry@sidley.com
cmcmanus@sidley.com

SIDLEY AUSTIN LLP

Stephen Hessler (*pro hac vice* pending)
Patrick Venter (*pro hac vice* pending)
Weiru Fang (*pro hac vice* pending)
787 Seventh Avenue
New York, New York 10019
Telephone: (212) 839-5300
Facsimile: (212) 839-5599
Email: shessler@sidley.com
pventer@sidley.com
weiru.fang@sidley.com

SIDLEY AUSTIN LLP

James W. Ducayet (*pro hac vice* pending)
Steven E. Sexton (*pro hac vice* pending)
Andrew F. Rodheim (*pro hac vice* pending)
One South Dearborn
Chicago, Illinois 60603
Telephone: (312) 853-7000
Facsimile: (312) 853-7036
Email: jducayet@sidley.com
ssexton@sidley.com
arodheim@sidley.com

*Proposed Attorneys for the Debtor
and Debtor in Possession*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re: MERIT STREET MEDIA, INC. ¹ Debtor.	Chapter 11 Case No. 25-80156 (SWE)
MERIT STREET MEDIA, INC. Plaintiff, v. TRINITY BROADCASTING OF TEXAS, INC., AND TCT MINISTRIES, INC. Defendants.	 Adv. Proc. No. 25-08006

¹ The last four digits of the Debtor's federal tax identification number are 8990. The Debtor's mailing address is 5501 Alliance Gateway Fwy, Fort Worth, TX 76177.

**DEBTOR’S MOTION FOR PARTIAL SUMMARY JUDGMENT
FOR PREFERENCE AVOIDANCE AGAINST TCT MINISTRIES, INC.**

Merit Street Media, Inc. (“Merit Street”), as debtor and debtor in possession in the above-captioned chapter 11 case, by and through counsel, and in accordance with the Court’s Order granting Merit Street’s motion to sever and seek expedited resolution of its preference avoidance claim in Count V of its Adversary Complaint (Dkt. 7), hereby moves the Court for an Order granting Partial Summary Judgment pursuant to Federal Rule of Bankruptcy Procedure 7056 (“the Motion”). In support of this Motion, Merit Street submits the accompanying *Memorandum Of Law In Support Of Motion For Partial Summary Judgment For Preference Avoidance Against TCT Ministries, Inc.* (the “Memorandum of Law”), as well as the following evidence, included in Merit Street’s appendix thereto:

- Exhibit A: September 9, 2024 Convertible Promissory Note
- Exhibit B: March 5, 2025 Assignment Of September 9, 2024 Convertible Promissory Note
- Exhibit C: May 27, 2025 UCC Financing Statement

In accordance with L.B.R. 7056-1(c)(2), each of the requirements set forth in L.B.R. 7056-1(c)(1) are set forth in the Memorandum of Law.

WHEREFORE, Merit Street respectfully requests that this Court grant partial summary judgment in favor of Merit Street on its preference avoidance claim in Count V of its Adversary Complaint, enter an order substantially in the form attached hereto, and grant such other relief as is just and proper.

Dated: July 14, 2025
Dallas, Texas

/s/ Jeri Leigh Miller

SIDLEY AUSTIN LLP

Thomas R. Califano (24122825)
Jeri Leigh Miller (24102176)
Parker G. Embry (24126826)
Chelsea McManus (24131499)
2021 McKinney Avenue, Suite 2000
Dallas, Texas 75201
Telephone: (214) 981-3300
Facsimile: (214) 981-3400
Email: tom.califano@sidley.com
jeri.miller@sidley.com
parker.embry@sidley.com
cmcmanus@sidley.com

and

James W. Ducayet (*pro hac vice* pending)
Steven E. Sexton (*pro hac vice* pending)
Andrew F. Rodheim (*pro hac vice* pending)
One South Dearborn
Chicago, Illinois 60603
Telephone: (312) 853-7000
Facsimile: (312) 853-7036
Email: jducayet@sidley.com
ssexton@sidley.com
arodheim@sidley.com

and

Stephen Hessler (*pro hac vice* pending)
Patrick Venter (*pro hac vice* pending)
Weiru Fang (*pro hac vice* pending)
787 Seventh Avenue
New York, New York 10019
Telephone: (212) 839-5300
Facsimile: (212) 839-5599
Email: shessler@sidley.com
pventer@sidley.com
weiru.fang@sidley.com

*Proposed Attorneys for the Debtor
and Debtor in Possession*

Certificate of Service

I certify that on July 14, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas.

/s/ Jeri Leigh Miller

Jeri Leigh Miller